

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**NOTICE OF MOTION TO COMPEL**  
**PRODUCTION OF DOCUMENTS PURSUANT TO SUBPOENA**

PLEASE TAKE NOTICE that upon the attached Declaration of Olga Musayev, Esq., sworn to January 15, 2019, the exhibits attached thereto, and the accompanying Memorandum of Law, Movant Intel Corporation (“Intel”), by and through its attorneys at Wilmer Cutler Pickering Hale and Dorr LLP, hereby moves this Court for entry of an order pursuant to Fed. R. Civ. P. 45 compelling production of documents improperly withheld by Respondent Fortress Investment Group LLC and its law firm, Irell & Manella LLP, as privileged in response to a subpoena issued by Intel in *VLSI Technology LLC v. Intel Corporation*, No. 5:17-cv-05671 (N.D. Cal.), and awarding such further relief as the Court deems proper.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, and reply papers shall be served pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York.

Dated: January 15, 2019

WILMER CUTLER PICKERING  
HALE AND DORR LLP

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